

March 3, 2021

Honorable Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Stansell v. Revolutionary Armed Forces of Colombia (“FARC”)*,
No. 1:16-mc-00405 (S.D.N.Y.) (Schofield, J.);

Pescatore v. Juvenal Ovidio Ricardo Palmera Pineda,
Case No. 1:18-mc-00545 (S.D.N.Y.) (Engelmayer, J.);

Caballero v. FARC, No. 1:20-mc-00249 (S.D.N.Y.) (Nathan, J.):
Plaintiffs’ Supplemental Response pursuant to Order Dkt. No. 186

Dear Judge Schofield:

Pursuant to Your Honor’s Order, Dkt. No. 186, Plaintiffs proposed a Joint Letter identifying the agencies or instrumentalities, including the court Orders in the above captioned cases, and the applicable U.S. sanctions for each person/entity. The Garnishees then decided to file their own letter [Dkt. No. 190] that included two Table columns that Plaintiffs objected to as beyond the scope of the Order. There was no final review or approval of the Garnishees’ letter by Plaintiffs’ counsel. Accordingly, for completeness, Plaintiffs hereby supplement the Garnishees’ letter with the additional information responsive to the Court Order below:

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| 1. Intervenor, Samark Jose Lopez Bello | Garnishee Citibank |
| 2. Intervenor Yakima Trading Corp. | Garnishee Citibank |

These Intervenors above were designated as Specially Designated Narcotics Traffickers pursuant to the Foreign Narcotics Kingpin Designation Act (Kingpin Act) on February 13, 2017 and identified by OFAC as part of the “El Aissami & Lopez Bello Network.” Dkt. No. 12-1 (OFAC Chart). Mr. Lopez Bello has also been indicted for criminal violations of the Kingpin Act, S.D.N.Y. No. 19-Cr-144, and he is on I.C.E.’s Top-10 “Most Wanted” List, “the subject of a months-long manhunt following the takedown of a complex international sanctions-evasion and money laundering operation.” The U.S. Dep’t of State has announced a \$5 million reward for information leading to the arrest and/or conviction of Lopez Bello for “participating in transnational organized crime.” Lopez Bello and Yakima Trading have each been found to be agencies or instrumentalities of the FARC by multiple courts: *Stansell v. FARC*, SDNY Case No. 16-mc-00405, (Carter, J.), 1/23/19, Dkt. No. 19; *Stansell v. FARC*, SDFL Case No. 19-cv-20896, (Scola, J.), 2/19/19, Dkt. No. 23; *Pescatore v. FARC*, SDNY Case No. 18-mc-00545, (Oetken, J.), 5/4/20, Dkt. No. 7; *Caballero v. FARC*, N.Y.S. Ct., Case No. 154864, (Billings, J.), 11/24/20, NYSECF Dkt. No. 72, (Lopez Bello only).

All the entities below are all sanctioned under IIEPA Exec. Orders 13850 and 13857, and OFAC's Venezuela Sanctions Regulations, 31 C.F.R. Part 591, and their assets are blocked.

3. Petrocedeno, S.A.	Garnishee Sumitomo Mitsui
4. Petrowarao, S.A.	Garnishee Sumitomo Mitsui
5. Venezuela Heavy Industries, C.A.	Garnishee Sumitomo Mitsui
6. Aceites y Solventes Venezolanso S.A.	Garnishee Citibank
7. Venfleet Asphalt Ltd.	Garnishee Citibank
8. Petro San Felix S.A.	Garnishee Citibank

Petrocedeno S.A. has been found to be a FARC agency or instrumentality by multiple courts: *Doe v. FARC et al.*, SDFL Case No. 10-cv-21517, (Huck, J.), Dkt. No. 288 (turnover), 6/5/20; *Stansell v. FARC*, SDFL Case No. 19-cv-20896, (Scola, J.), Dkt. No. 499 (turnover), 9/11/20; *Stansell v. FARC*, SDNY Case No. 16-mc-00405, (Carter, J.), Dkt. No. 114, 12/15/20; *Pescatore v. FARC*, SDNY Case No. 18-mc-00545, (Carter, J.), 12/15/20, Dkt. No. 40.

Petrowarao, S.A.; Venezuela Heavy Industries, C.A.; Aceites y Solventes Venezolanso S.A.; Venfleet Asphalt Ltd; Petro San Felix S.A. have previously been found to be an agency or instrumentality of the FARC: *Stansell v. FARC*, SDNY Case No. 16-mc-00405, (Carter, J.), Dkt. No. 114, 12/15/20; *Pescatore v. FARC*, SDNY Case No. 18-mc-00545, (Carter, J.), 12/15/20, Dkt. No. 40. *See also Caballero v. FARC*, SDNY Case No. 20-mc-00249, (Nathan, J.), Dkt. No. 9-9, 12/16/20 (Venezuela Heavy, Petrowarao, & Petro San Felix).

9. Banco Bandes Uruguay S.A.	Garnishee Equiniti Trust Co.
10. Banco Bicentenario Banco Universal CA	Garnishee Equiniti Trust Co.
11. Banco de Venezuela SA Banco Universal	Garnishee Equiniti Trust Co. and Citibank

Banco Bandes Uruguay S.A.; Banco Bicentenario Banco Universal CA ; Banco de Venezuela SA Banco Universal have been found to be agencies or instrumentalities of the FARC: *Stansell v. FARC*, SDNY Case No. 16-mc-00405, (Carter, J.), Dkt. No. 130, 1/7/21; *Pescatore v. FARC*, SDNY Case No. 18-mc-00545, (Carter, J.), Dkt. No. 58, 1/7/21. *See Caballero v. FARC*, SDNY Case No. 20-mc-00249, (Nathan, J.), Dkt. No. 9-9, 12/16/20 (Banco Bandes de Uruguay).

12. Venezuela Ministry of Finance	Garnishee Citibank
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Venezuela Ministry of Finance has also been found to be an agency or instrumentality of the FARC. *Stansell v. FARC*, SDNY Case No. 16-mc-00405, (Carter, J.), Dkt. No. 176, 2/8/21; *Pescatore v. FARC*, SDNY Case No. 18-mc-00545, (Carter, J.), Dkt. No. 58, 2/8/21.

Respectfully,

/s/ Newt Porter and Tony Korvick, for Stansell Plaintiffs

/s/ Nathaniel Tarnor, for Pescatore Plaintiffs as interpleader third-party defendants